

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

COLLEEN MITCHELL,	)	
	)	
Plaintiff,	)	Civil Action 08 C 1233
	)	
v.	)	Judge Leinenweber
	)	
MARAUDER CORPORATION, a California	)	Magistrate Judge Schenkier
Corporation, d/b/a COLLECTION	)	
PROFESSIONAL SERVICES and d/b/a	)	
NATIONWIDE CAPITAL RECOVER,	)	
EXPERIAN INFORMATION SOLUTIONS,	)	
INC. and TRANS UNION, LLC,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER  
OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant, Marauder Corporation, a California Corporation, d/b/a Collection Professional Services and d/b/a Nationwide Capital Recovery ("Marauder"), by its attorneys, hereby moves this Court, under Fed. R. Civ. P. 6(b), for an extension of time to answer or otherwise plead in response to Plaintiff's Complaint, and in support thereof states as follows:

1. Pursuant to service of summons, Marauder is required to answer or otherwise plead in response to Plaintiff's Complaint by March 26, 2008.
2. The allegations in the Complaint against Marauder relate to debt collection practices as well as disputes that Plaintiff sent to certain credit bureaus concerning consumer credit information in Plaintiff's file.
3. Marauder is in the process of investigating its records concerning Plaintiff's allegations in the Complaint.
4. On March 20, 2008, counsel for Plaintiff agreed to the proposed extension.

5. Marauder respectfully requests that this Court extend its time to answer or otherwise plead to and including April 25, 2008.
6. Marauder's motion is not brought for purposes of needlessly delaying the proceedings and will not prejudice any party.

WHEREFORE, Marauder respectfully requests that this Court grant its motion for an extension of time to answer or otherwise plead in response to Plaintiff's Complaint to and including April 25, 2008.

Dated: March 24, 2008

Respectfully submitted,

MARAUDER CORPORATION

By: /s/ Gary S. Caplan  
One of Its Attorneys

Gary S. Caplan  
Reed Smith LLP  
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312-207-1000

CHILIB-2168540.1-999999-99999

**CERTIFICATE OF SERVICE**

I, Gary S. Caplan, an attorney, hereby certify that I caused a copy of the attached **Agreed Motion for Extension of Time to Answer or Otherwise Plead in Response to Plaintiff's Complaint** to be served upon the following parties by U.S. Mail, postage prepared, this 24th day of March, 2008:

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Bonnie Dragotto  
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By: /s/ Gary S/ Caplan  
One of Its Attorneys